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December 4, 2023

VIA ECF

Honorable Robert Kugler, U.S.D.J.
U.S. District Court - District of N.J.
Mitchell S. Cohen Building &
U.S. Courthouse
1 John F. Gerry Plaza, Courtroom 4D
4th and Cooper Streets
Camden, New Jersey 08101

Honorable Thomas I. Vanaskie (Ret.)
Special Master
Stevens & Lee
1500 Market St., East Tower,
Suite 1800
Philadelphia, Pennsylvania 19103

Re: ***In re Valsartan, Losartan, and Irbesartan Liability Litigation,***
Case No. 1:19-md-02875-RBK (D.N.J.)

Dear Judge Kugler and Judge Vanaskie:

Please accept this letter on behalf of Plaintiffs in advance of the December 6,
2023 case management conference.

1. TPP Trial.

For the upcoming TPP trial, Defendants have proposed an order establishing
deadlines for supplemental expert reports on damages as well as the filing of answers
and summary judgment motions. Plaintiffs are considering that proposed order and

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hope to reach an agreement with Defendants before the case management conference. Plaintiffs will be prepared to discuss the proposed order and any other pretrial issues with the Court during the conference.

2. PFS Deficiencies and Orders to Show Cause.

Plaintiffs will be prepared to address this issue during the conference.

Respectfully,



ADAM M. SLATER

Cc: All counsel of record (via ECF)